### SO ORDERED



## UNITED STATES BANKRUPTCY COURT DISTRICT OF MARYLAND (Baltimore Division)

In re:		
Roman Catholic Archbishop of Baltimore,	Debtor.	Chapter 11 Case No. 23-16969-MMH

## STIPULATION AND CONSENT ORDER RESOLVING NOTICE OF DISPOSITION OF PROPERTY

WHEREAS, this Stipulation is entered into by the Roman Catholic Archbishop of Baltimore (the "Debtor") and the Official Committee of Unsecured Creditors (the "Committee" and together with the Debtor, the "Parties") in the above-captioned bankruptcy case for the purpose of reaching resolution on the Debtor's pending Notice of Disposition of Real Property (Dkt. 1440) (the "Howard County Notice").

**WHEREAS**, the parties, by their undersigned attorneys, hereby agree and stipulate as follows,

**NOW THEREFORE**, it is hereby Ordered by the United States Bankruptcy Court for the District of Maryland:

1. With respect to the proposed dedication of a portion of the parcel of real property that the Debtor owns (the "Howard County Property") for a right of way, which Howard County Property and the portion to be dedicated (the "Right of Way") are more fully described in the

Howard County Notice as well as attached **Exhibit A** hereto, the Debtor is authorized to dedicate the Right of Way to Howard County, Maryland.

- 2. With respect to the proposed dedication of a portion of the Howard County
  Property as a forest conservation easement (the "Forest Conservation Easement"), which is more
  fully described in the Howard County Notice, also reflected in attached Exhibit A, the Debtor is
  authorized to dedicate the Forest Conservation Easement to Howard County, Maryland.
- 3. The Debtor's proposed dedication of both the Right of Way and the Forest Conservation Easement shall be deemed to be in accordance with the Debtor's sound business judgment.
- 4. Notwithstanding the dedication or improvement of the Right of Way or the Forest Conservation Easement; for purposes of any plan confirmation proposed by the Debtor, any analysis as to the necessity of the property to the Debtor's mission and current operations shall be based on the character, use and nature of the portion of the Howard County Property as it existed prior to the dedication of the Right of Way and Forest Conservation Easement to Howard County, Maryland. If, however, the Howard County Property undergoes any change in character, use, or nature other than with respect to the improvements described in the Howard County Notice, any such change in character, use or nature shall be considered for purposes of any such liquidation analysis.

Dated: November 13, 2025

#### **CONSENTED TO:**

/s/ Catherine Keller Hopkin

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Counsel for the Official Committee of Unsecured Creditors

I HEREBY CERTIFY that the terms of the copy of the Stipulation and Consent Order submitted to the Court are identical to those set forth in the original; and the signatures represented by the /s/ on this copy reference the signatures of consenting parties on the original consent order.

/s/ Catherine Keller Hopkin
Catherine Keller Hopkin

cc: Catherine Keller Hopkin, Esquire YVS Law, LLC 185 Admiral Cochrane Drive, Suite 130 Annapolis, Maryland 21401 Attached Service List

#### END OF ORDER

### The following parties received CM/ECF notice of the filing:

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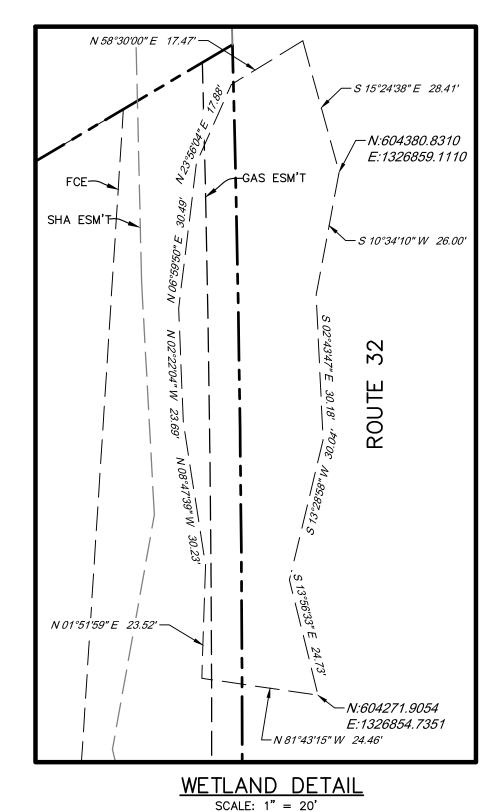
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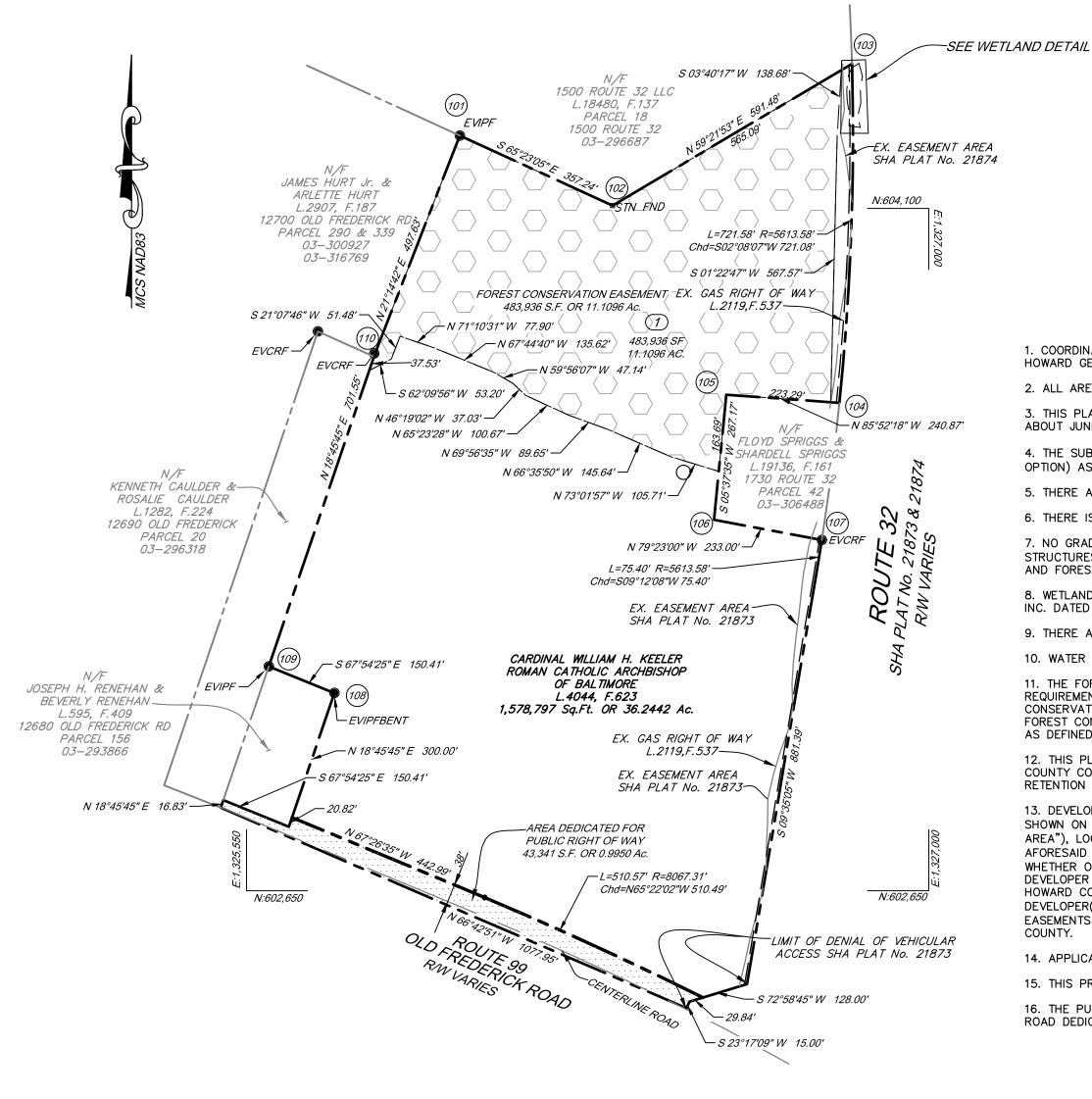
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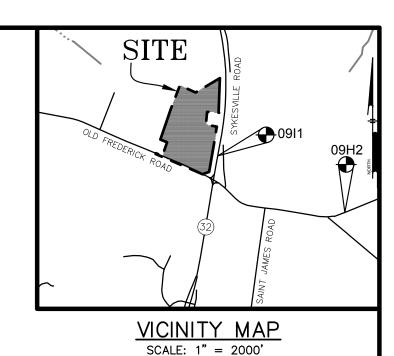
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## EXHIBIT A

COORDINATES LIST			
POINT	NORTH	EAST	
101	604254.8012	1326003.1987	
102	604106.0017	1326327.9742	
103	604407.4028	1326836.8979	
104	603686.8236	1326810.0295	
105	603704.1645	1326569.7845	
106	603438.2817	1326543.5902	
107	603395.3539	1326772.6015	
108	603070.1504	1325736.5916	
109	603126.7217	1325597.2257	
110	603790.9908	1325822.8788	



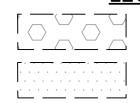




### **GENERAL NOTES**

- 1. COORDINATES BASED ON NAD 83, MARYLAND COORDINATE SYSTEM AS PROJECTED BY HOWARD GEODETIC CONTROL STATIONS Nos. 09H2 AND 09I1.
- 2. ALL AREAS SHOWN ON THIS PLAT ARE MORE OR LESS.
- 3. THIS PLAT IS BASED ON A FIELD RUN MONUMENTED BOUNDARY SURVEY PERFORMED ON OR ABOUT JUNE, 2023 BY PENNONI ASSOCIATES.
- 4. THE SUBJECT PROPERTY IS ZONED RC-DEO (RURAL CONSERVATION-DENSITY EXCHANGE OPTION) AS PER 10/06/2023 COMPREHENSIVE ZONING PLAN.
- 5. THERE ARE NO VISIBLE SIGNS OF CEMETERIES WITHIN THE SUBJECT PROPERTY.
- 6. THERE IS AN EXISTING DWELLING LOCATED ON PARCEL TO REMAIN.
- 7. NO GRADING, REMOVAL OF VEGETATIVE COVER OR TREES, OR PLACEMENT OF NEW STRUCTURES IS PERMITTED WITHIN THE LIMITS OF WETLANDS, STREAM(S), OR THEIR BUFFERS AND FOREST CONSERVATION EASEMENT AREAS.
- 8. WETLANDS ARE PRESENT ON SITE AS FIELD VERIFIED BY WETLAND STUDIES AND SOLUTIONS, INC. DATED NOVEMBER 28, 2023.
- 9. THERE ARE NO FLOODPLAIN LIMITS WITHIN THE LIMITS OF THE SUBJECT PROPERTY.
- 10. WATER AND SEWER SERVICES WILL BE PROVIDED BY PRIVATE ON-SITE WELL AND SEPTIC.
- 11. THE FOREST CONSERVATION EASEMENT HAS BEEN ESTABLISHED TO FULFILL THE REQUIREMENTS OF SECTION 16.1200 OF THE HOWARD COUNTY CODE AND FOREST CONSERVATION ACT. NO CLEARING, GRADING OR CONSTRUCTION IS PERMITTED WITHIN THE FOREST CONSERVATION EASEMENT: HOWEVER, FOREST CONSERVATION MANAGEMENT PRACTICES AS DEFINED IN THE DEED OF FOREST CONSERVATION EASEMENT ARE ALLOWED.
- 12. THIS PLAT COMPLIES WITH THE REQUIREMENTS OF SECTION 16.1200 OF THE HOWARD COUNTY CODE FOR FOREST CONSERVATION BY PROVIDING 11.3208 ACRES OF FOREST RETENTION IN A FOREST CONSERVATION EASEMENT.
- 13. DEVELOPER RESERVES UNTO ITSELF, ITS SUCCESSORS AND ASSIGNS, ALL EASEMENTS SHOWN ON THIS PLAN FOR FOREST CONSERVATION(DESIGNATED AS "FOREST CONSERVATION AREA"), LOCATED IN, ON, OVER AND THROUGH LOTS/PARCELS, ANY CONVEYANCES OF THE AFORESAID LOTS/PARCELS SHALL BE SUBJECT TO THE EASEMENTS HEREIN RESERVED, WHETHER OR NOT EXPRESSLY STATED IN THE DEED(S) CONVEYING SAID LOTS/PARCELS. DEVELOPER SHALL EXECUTE AND DELIVER DEEDS FOR THE EASEMENTS HEREIN RESERVED TO HOWARD COUNTY. THE FOREST CONSERVATION EASEMENT UPON COMPLETION OF THE DEVELOPER(S) SURETY POSTED WITH SAID AGREEMENT.. THE COUNTY SHALL ACCEPT THE EASEMENTS AND RECORD THE DEED(S) OF EASEMENT IN THE LAND RECORDS OF HOWARD
- 14. APPLICABLE DPZ FILE REFERENCES: ECP-24-035 & BA-21-024C.
- 15. THIS PROJECT IS LOCATED IN THE PATUXENT RIVER WATERSHED, MDE No. 021309081022.
- 16. THE PURPOSE OF THIS PLAT IS TO CREATE THE FOREST CONSERVATION EASEMENT AND ROAD DEDICATION ON OLD FREDERICK ROAD.

### LEGEND



DATE

FOREST CONSERVATION EASEMENT

RECORDED AS PLAT No. $lue{}$ 

COUNTY, MARYLAND.

ROAD DEDICATION FOR OLD FREDERICK ROAD

# *Pennoni/*

I FURTHER CERTIFY THAT THE REQUIREMENTS OF

ANNOTATED CODE OF MARYLAND, 1988 REPLACEMENT

TO THE MAKING OF THIS PLAT AND THE SETTING OF

VOLUME, (AS SUPPLEMENTED) AS FAR AS THEY RELATE

APPROVED: HOWARD COUNTY DEPARTMENT OF PLANNING

SECTION 3-108 THE REAL PROPERTY ARTICLE.

MARKERS HAVE BEEN COMPLIED WITH.

D. DARRIN KIRK No. 21543

AND ZONING.

NAME

DIRECTOR

8890 McGaw Road, Suite 100 Columbia, Maryland 21045 (O) 410-997-8900 (F) 410-997-9282

DATE

DATE

DATE

OFFICE OF THE ARCHBISHOP C/O DIVISION OF FACILITIES & REAL ESTATE 320 CATHEDRAL STREET BALTIMORE, MD 21201 PHONE No.: (410) 547-5437

### SURVEYOR'S CERTIFICATE

HEREBY CERTIFY THAT THE FINAL PLAT SHOWN HEREON IS CORRECT; THAT IT IS ALL THE LANDS CONVEYED BY FRANCES E. FRENCH ET.AL. TO CARDINAL WILLIAM H. KELLER, ROMAN CATHOLIC ARCHBISHOP OF BALTIMORE, BY DEED DATED AUGUST 21, 1997 AND RECORDED AMONG THE LAND RECORDS OF HOWARD COUNTY, MARYLAND IN LIBER 4044 AT FOLIO 623 AND THAT ALL MONUMENTS ARE IN PLACE OR WILL BE IN PLACE PRIOR TO THE ACCEPTANCE OF THE STREETS IN THE SUBDIVISION BY HOWARD COUNTY AS SHOWN IN ACCORDANCE WITH THE ANNOTATED CODE OF MARYLAND, AS AMENDED.



D. DARRIN KIRK PROFESSIONAL LAND SURVEYOR MD REGISTRATION No. 21543 (EXPIRES DECEMBER 21, 2025) U:IACCOUNTSIABALTIABALT21001 - HOLY KOREAN MARTYRS CATHOLIC CHURCHIDESIGNIVISECUREIABALT21001-V-PLAT.DWG I, ARCHBISHOP OF BALTIMORE, WILLIAM E. LORI, OWNER(S) OF THE PROPERTY SHOWN AND DESCRIBED HEREON, HEREBY ADOPT THIS PLAT; AND IN CONSIDERATION OF THE APPROVAL OF THIS FINAL PLAT OF FOREST CONSERVATION EASEMENT BY THE DEPARTMENT OF PLANNING AND ZONING, TO ESTABLISH THE FOREST CONSERVATION EASEMENT AND ROAD DEDICATION FOR OLD FREDERICK ROAD.

OWNER'S CERTIFICATE

FOREST CONSERVATION EASEMENT TABULATION

11.1096 ACRES

DATE

483.936 SQUARE FEET

ARCHBISHOP OF BALTIMORE

WILLIAM E. LORI

PLAT FOR FOREST CONSERVATION EASEMENT HOLY KOREAN MARTYRS CATHOLIC CHURCH

AMONG THE LAND RECORDS OF HOWARD

SDP-25-024

3rd ELECTION DISTRICT HOWARD COUNTY, MARYLAND GRID NO. 23 TAX MAP NO. 09 PARCEL 21 ZONED: RC-DEO

WITNESS

SCALE: 1" = 200' DATE: 09.22.2025 ABALT21001/V/SECURE/ABALT21001-V-PLAT

SDP - 25 - 024